

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

R. ALEXANDER ACOSTA, Secretary of Labor, :
United States Department of Labor, :

Plaintiff,

: **COMPLAINT**

: Civil Action No.

v.

PRIVATE COPS SECURITY, CORP., :
PALMAS COPS SECURITY, INC., POLICE :
CAMPUS SECURITY MANAGEMENT, LLC, :
and ARNALDO L. LEON MATHEU, :
Individually, :

Defendants.

Plaintiff R. Alexander Acosta, Secretary of Labor, United States Department of Labor, by and through undersigned counsel, brings this action under sections 16 and 17 of the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. § 201, et seq. (“the Act” or “the FLSA”), alleging that defendants violated sections 7, 11(c), 15(a)(2), and 15(a)(5) of the Act, to recover back wages, liquidated damages, and to enjoin acts and practices which violate the provisions of the FLSA, and to obtain other appropriate relief.

As described herein, defendants have denied hundreds of their employees’ rightful overtime wages by (1) misclassifying defendants’ security guards as independent contractors; (2) failing to pay time-and-a-half for hours worked over 40 in a workweek; and (3) doing business under multiple entities to evade legal obligations under the FLSA. Defendants further failed to make, keep, and preserve adequate and accurate records of hours worked by its employees. As a result of defendants’ unlawful payment practices, 306 current and former security guards are owed unpaid wages.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to section 17 of the FLSA, 20 U.S.C. § 217, and 28 U.S.C. §§ 1331 and 1345.
2. Venue is proper in the United States District Court for the District of Puerto Rico because a substantial part of the events and/or omissions giving rise to the claims herein occurred in this district.

FACTUAL ALLEGATIONS

3. Plaintiff R. Alexander Acosta, Secretary of Labor, United States Department of Labor, is vested with authority to file suit to restrain violations of the FLSA and recover back wages and liquidated damages and is the proper plaintiff for this action.
4. Defendant PRIVATE COPS SECURITY, CORP. (“Private Cops”) is a corporation duly organized under the laws of the Commonwealth of Puerto Rico, having its last known principal office and place of business at Palmanova Plaza Suite 127B, Humacao, Puerto Rico 00791, within the jurisdiction of this Court, where it is engaged in the business of providing security services.
5. Defendant PALMAS COPS SECURITY, INC. (“Palmas”) is a corporation duly organized under the laws of the Commonwealth of Puerto Rico, having its last known principal office and place of business at Palmanova Plaza Suite 127B, Humacao, Puerto Rico 00791, within the jurisdiction of this Court, where it is engaged in the business of providing security services.
6. Defendant POLICE CAMPUS SECURITY MANAGEMENT, LLC (“Police Campus”) is a corporation duly organized under the laws of the Commonwealth of Puerto Rico, having its last known principal office and place of business at Palmanova Plaza Suite 127B, Humacao,

Puerto Rico 00791, within the jurisdiction of this Court, where it is engaged in the business of providing security services.

7. Defendant ARNALDO L. LEON MATHEU (“Leon Matheu”) is in active control and management of all the corporate defendants. Defendant Leon Matheu regulates the employment of all persons employed by him and has the authority to and does hire, fire, and supervise employees, control their hours worked, determine employee compensation, and otherwise act directly and indirectly in the interest of all the corporate defendants in relation to the employees during the relevant time period. He is thus an employer of the employees within the meaning of section 3(d) of the Act.

8. Defendant Leon Matheu resides in the Commonwealth of Puerto Rico, within the jurisdiction of this Court.

Defendants are an Enterprise Engaged in Commerce

9. The business activities of the corporate defendants, as described herein, are related and performed through unified operation or common control for a common business purpose and constitute an enterprise within the meaning of section 3(r) of the Act.

10. Defendant Leon Matheu is the owner and president of all three corporate defendants.

11. The corporate defendants were created for the purpose of, and are engaged in, the business of providing security services, and do business under the same initials, “P.C.S.”

12. The corporate defendants share or have overlapping employees. For example, in a single pay period, one employee might work at different times as a security guard for both Police Campus and for Palmas.

13. The corporate defendants are managed by the same individuals, including Human Resources Administrator, Sonia Diaz; Payroll Administrator, Sonia Escoda; and defendant Leon

Matheu. The enterprise (and each corporate defendant) has had an annual gross volume of sales made or business done in an amount not less than \$500,000 for the period covered by this Complaint.

14. The enterprise has employees handling and using goods or materials that have been moved in or produced for commerce, such as radios, weapons, uniforms, or vehicles.

The Security Guards are Employees

15. At all relevant times from April 9, 2014 through the present, defendants have employed armed and unarmed security guards to provide security to entities in the Commonwealth of Puerto Rico.

16. At all relevant times, defendants have required their employees employed as security guards to wear uniforms.

17. At all relevant times, defendants have set their employees' work schedules and required them to sign-in and sign-out on daily attendance records.

18. At all relevant times, defendants have set their employees' rate of pay.

19. At all relevant times, defendants' employees employed as security guards have no opportunity for profit or loss.

20. Despite the U.S. Department of Labor's Wage and Hour Division ("Wage and Hour Division") having previously found that Private Cops and Palmas violated the FLSA from November 22, 2010 to November 18, 2012, defendants have continued to misclassify their security guard employees as "professional services," or independent contractors, and not as employees.

21. Defendants' employees working as security guards are an integral part of their business and without them, Defendants would not be able to provide security guard services.

Defendants' Pay Practices

22. Defendants Private Cops, Palmas, and Police Campus each operate numerous security guard posts.
23. At all relevant times, defendants' employees sometimes performed work for more than one of the three defendant entities during the same workweek and/or pay period.
24. Defendants did not aggregate, for the purposes of calculating payment, the hours worked by employees for more than one of the three entities in a workweek or pay period.
25. Defendants paid employees by check, and sometimes by multiple checks, on a bi-weekly basis.
26. At all relevant times, defendants typically paid their employees working as unarmed guards a regular rate of \$7.25 per hour.
27. At all relevant times, defendants typically paid their employees working as armed guards a regular rate ranging from \$7.50 per hour to \$8.50 per hour.
28. During some bi-weekly pay periods, from April 9, 2014 through the present, defendants' employees worked, for either one defendant entity or more than one defendant entity, in excess of 40 hours during one or both workweeks in a bi-weekly pay period.
29. Defendants' employees typically worked between 20 and 40 hours per workweek. For the workweeks that exceeded 40 hours, defendants failed to pay their employees time and one half of their regular rate of pay for the hours that exceeded 40. Instead, defendants paid their employees at their regular rates of pay ("straight time").
30. For example, for the bi-weekly period of March 16, 2015 through March 29, 2015 an employee who worked a total of 92 hours at her assigned security post was paid at her regular rate despite working 12 overtime hours.

31. Similarly, for the pay period of July 27, 2015 through August 9, 2015, an employee who worked a total of 96 hours at his assigned security post was paid at his regular rate despite working 16 overtime hours.

32. Defendants' practice of paying straight time for hours in excess of 40 continued even after they were previously advised by the Wage and Hour Division that they were required to pay their employees overtime. These violations are ongoing.

Defendants' Record Keeping Practices

33. At all relevant times beginning on or before April 9, 2014, defendants did not maintain accurate and complete records of total employee hours worked each workweek, and total employee earnings.

34. Despite requiring their employees to sign-in and sign-out on daily attendance sheets, defendants failed to maintain time records that accurately listed the total weekly hours worked by employees.

35. Instead, defendants required employees to record their hours worked on separate attendance sheets. Defendants required employees to record all hours worked up to 40 in a workweek on one attendance sheet and to record any hours worked over 40 in a workweek on a separate attendance sheet.

36. During the Department of Labor investigation, defendants only provided the attendance sheets that recorded hours worked by employees up to 40 per workweek.

Defendants' Actions are Willful

37. In 2012, the Wage and Hour Division conducted investigations of defendants Private Cops and Palmas for the period November 22, 2010 through November 18, 2012. As part of the 2012 investigation, Wage and Hour Division personnel explained the principles of FLSA

compliance to defendants Leon Matheu, Private Cops, and Palmas, including the requirements for record keeping and payment of overtime compensation.

38. As a result of the 2012 investigations, Private Cops, Palmas, and Leon Matheu paid back wages to approximately 164 employees for violations of the minimum wage and overtime provisions of the FLSA.

39. Thus, defendants knew of their obligations to pay their employees in compliance with the FLSA and to keep accurate records.

40. In addition, defendants intentionally concealed the hours of overtime employees worked by maintaining separate attendance sheets for recording overtime hours, failing to provide these separate attendance sheets to the Wage and Hour Division, and by issuing multiple checks to employees in a single bi-weekly pay period.

41. Accordingly, defendants' failure to pay minimum wage and overtime and failure to maintain and provide to the Wage and Hour Division time records that has led to the filing of this complaint is willful and repeated.

Statute of Limitations Tolling Agreement

42. On or about September 2, 2016, the Secretary and Defendants knowingly and voluntarily entered into a Statute of Limitations Tolling Agreement.

43. The Statute of Limitations Tolling Agreement provides that any legal proceeding brought by the Secretary or affected employees after June 5, 2016 "shall be deemed to have been filed 728 days prior to the actual filing date."

44. Accordingly, this Complaint filed on May 24, 2017 shall be deemed to have been filed 727 days prior to the actual filing date.

FIRST CAUSE OF ACTION

Violation of Section 7(a) of the FLSA, Failure to Pay Overtime

45. The Secretary incorporates by reference and realleges the allegations in paragraphs 1 to 44 of the Complaint.

46. Defendants in many workweeks have willfully and repeatedly violated sections 7 and 15(a)(2) of the Act by employing former and current employees in an enterprise engaged in commerce or in the production of goods for commerce, for workweeks longer than 40 hours without compensating the employees for their employment in excess of the prescribed hours at rates not less than one and one-half times the regular rates at which they were employed.

47. Therefore, defendants are liable for unpaid overtime compensation owing to their employees under section 7 of the Act and an additional equal amount as liquidated damages pursuant to section 16(c) of the Act, or in the event liquidated damages are not awarded, overtime compensation and prejudgment interest under section 17 of the Act.

SECOND CAUSE OF ACTION

Violation of Sections 11(c) and 15(a)(5) of the FLSA, Recordkeeping

48. The Secretary incorporates by reference and re-alleges the allegations in paragraphs 1 to 44 of the Complaint.

49. Defendants have willfully and repeatedly violated the provisions of sections 11(c) and 15(a)(5) of the Act, in that defendants failed to keep, and preserve adequate and accurate records as prescribed by the regulations issued and found at 29 C.F.R. Part 516.

50. At all relevant times, defendants failed to make, keep, and preserve adequate and accurate records of hours worked and wages paid because defendants did not keep records of aggregated hours worked by employees for multiple defendant entities in a single pay period.

WHEREFORE, cause having been shown, plaintiff respectfully prays for judgment

against defendants providing the following relief:

- (1) An injunction issued pursuant to section 17 of the Act permanently restraining defendants, their officers, agents, servants, employees, and those persons in active contact or participation with defendants, from violating the provisions of sections 7, 11(c), 15(a)(2), and 15(a)(5) of the Act;
 - (2) An order pursuant to section 16(c) of the Act finding defendants liable for unpaid minimum wage and overtime compensation found due defendants' employees listed on attached Exhibit A;
 - (3) An order pursuant to section 16(c) of the Act finding defendants liable for an equal amount of liquidated damages (additional minimum wage and overtime compensation and liquidated damages may be owed to certain employees presently unknown to plaintiff for the period covered by this Complaint); or in the event liquidated damages are not awarded, prejudgment interest computed at the underpayment rate established by the Secretary of the Treasury pursuant to 26 U.S.C. § 6621;
 - (4) An order compelling defendants to reimburse the Secretary for the costs of this action;
- and

(5) An order granting such other relief as the Court may deem necessary or appropriate.

DATED: May 24, 2017
New York, New York

Nicholas C. Geale
Acting Solicitor of Labor

JEFFREY S. ROGOFF
Regional Solicitor

By: /s/Molly J. Theobald
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*Attorneys for Plaintiff Secretary of
Labor R. Alexander Acosta*

EXHIBIT A

First Name	MI	Last Name
CARLOS	F	ACEVEDO SANTOS
LINO		ACOSTA MACHIN
VICTOR		AGUEDA PRATTS
DAVID		ALDEA RIVERA
EDGARD	D	ALEJANDRO HERNANDEZ
CESAR	R	ALEMAN RIVERA
ZENaida		ALICEA ALGEA
MIGUEL	A	ALICEA COLON
MARIA	L	ALICEA MARTINEZ
OSVALDO	J	ALVAREZ SANTIAGO
JOSE	M	ALVAREZ SOTO
ALBERTO	L	AMARO LEBRON
JOSE	R	ANDREU AMADOR
FRANCISCO	A	AROCHO ROMAN
ZAVIER		ARROYO MERCADO
EDWIN		AYALA DIAZ
SANTIAGO		BELTRAN SERRANO
RAMON	L	BERENGUER ANDUJAR
LUIS	D	BERNARDI ALVARADO
ANGEL	L	BERRIOS COLON
LUIS	M	BONILLA DE JESUS
JUAN	J	BORIA NAVARRO
KELVIN		BRITO RODRIGUEZ
RAUL	D	BRITO TORRES
RICARDO		BURGOS ARROYO
JUAN	L	BURGOS GOMEZ
JACINTO		BURGOS GONZALEZ
PATRICIA	P	BURGOS SALGADO
LUIS	A	BURGOS VELAZQUEZ
LOURDES		CABAN SEGUI
ROBERTO		CABRERA SANCHEZ
JOSE	A	CABRERA TORRES
YARILIS		CAEZ AYALA
LUIS	A	CAMACHO COLON
WILFREDO	R	CAMACHO RIVERA
VICTOR	M	CARDONA ALVARADO
MODESTO		CARMONA COSME
JOSE	A	CARRASQUILLO CABRERA
ALFREDO		CARRASQUILLO GARCIA

ANGEL	M	CARRASQUILLO GARCIA
JAVIER		CARRASQUILLO RODRIGUEZ
LUIS	A	CARTAGENA LOPEZ
MARCOS	A	CARTAGENA RIVERA
JOSE		CLAUDIO DIAZ
EDGAR	J	COLON ALICEA
EMMANUEL		COLON AYALA
JOSE	R	COLON GONZALEZ
JOSE	L	COLON ORTIZ
HUGO	L	COLON RIOS
REY	D	CONCEPCION MELENDEZ
GILBERTO		COSME CEPEDA
CARLOS	A	COSME MALDONADO
GILBERTO		COSME ORTIZ
MARTIN	J	CRESPO RAMOS
FELIX	E	CRUZ GONZALEZ
EDWIN		CRUZ MOLINA
JOSE	A	CRUZ ORTIZ
JORGE	L	CRUZ PEREZ
RAYMOND		CRUZ RIVERA
TANYA	V	CRUZADO RODRIGUEZ
JACQUELINE	M	CUBANO ROSADO
LORRAINE		CUBANO ROSADO
ANGEL	R	CUEVAS ALVARADO
MARIANO		DE JESUS CASTRO
MIGUEL	A	DE JESUS NEGRON
JASON	L	DE JESUS REYES
JUAN	A	DE JESUS SERBIA
JAVIER	A	DEL RIO MARQUEZ
MIGDALIA		DEL VALLE CRUZ
EFRAIN		DEL VALLE MIRANDA
JOSE	R	DEL VALLE NEVAREZ
CARLOS	R	DEL VALLE REYES
ALEJANDRO		DEL VALLE VILLEGAS
EDWIN		DELGADO CARDONA
DAVID		DIAZ ALICEA
MARIO	B	DOMINGUEZ ACOSTA
HECTOR		DOMINGUEZ LOPEZ
JOSE	L	DONES AYALA
LUIS	E	DONES AYALA
ARDEN	S	DRAGONI PASTRANA

ROSE MARY		ELBA CAQUIAS
RICARDO		ESTRADA MELENDEZ
JORGE	J	FERNANDEZ CRUZ
KEN	L	FIGUEROA ACEVEDO
MANUEL		FIGUEROA GARCIA
JIMMY		FIGUEROA MARTINEZ
CANDIDO		FIGUEROA MONZON
RICARDO		FLORES LORENZO
JOSE	J	FONTANEZ BYRON
MARCIAL		FONTANEZ COTTO
CARLOS	A	FUENTES MONTANEZ
EDGARDO		GALARZA GONZALEZ
ERIC		GARCIA AROMI
JORGE	L	GARCIA BERRIOS
ADAMS		GARCIA CAMACHO
JOSE	A	GARCIA DE JESUS
LIZBETH		GARCIA DUPREY
ANGEL	I	GARCIA FERNANDEZ
FRANK	M	GARCIA QUINTANA
LUIS	F	GARCIA ROSA
JORGE	L	GARCIA SANTIAGO
JUAN	E	GINORIO BONILLA
EDITH	M	GOLDEROS CABALLERO
ALEXIS		GOMEZ JIMENEZ
JOSEPH	C	GOMEZ REYES
WELBY		GOMEZ RODRIGUEZ
JOSE	R	GONZALEZ DAVILA
EDGAR	A	GONZALEZ GUILBE
MIGUEL	A	GONZALEZ MALAVE
JORGE	L	GONZALEZ ORTIZ
JOMAR	J	GONZALEZ PEREZ
JONATHAN		GONZALEZ RIVERA
YOMARIE	A	GONZALEZ RIVERA
MIGUEL	A	GONZALEZ RODRIGUEZ
RICARDO		GONZALEZ ROTGER
JESUS		GONZALEZ VERGARA
OSVALDO	J	GORBEA
ANTONIO	J	GOTAY ROMAN
IDALISSE		GRULLON SANABRIA
JOHNNY		GUERRERO RIOS
REY	M	GUTIERREZ CRUZ

PEDRO	W	HERNANDEZ MARTINEZ
NICOLE	M	HERNANDEZ RAMOS
ANGEL	M	HERNANDEZ RIVERA
JOEL		HILERIO RODRIGUEZ
JOSE	J	IRIZARRY BETANCOURT
JORGITO		IRIZARRY SANTIAGO
BASILIO		JIMENEZ MATOS
DANIEL		JIMENEZ ROMAN
CARLOS	M	JIMENEZ TORRES
DAVID	J	JONES
ALLEN		LAZU VAZQUEZ
ERNIE	W	LEBRON AMARO
JOSE	A	LEBRON FIGUEROA
JORGE	O	LISBOA ROSARIO
JUDITH		LOPEZ CRUZ
ANDY		LOPEZ DIAZ
WILLIAM	I	LOPEZ LICIAGA
LUIS	A	LOPEZ PEREZ
JUAN	A	LOPEZ RIVERA
MELVIN		LOPEZ SOTO
JOHN		LOPEZ TORRES
RAMON	L	LOPEZ VALDEZ
RAMON		LUYANDO CABRERA
JUAN	R	MACHUCA
ANGEL	R	MARIANO GERMOSEN
CHRISTIAN		MARTINEZ BAEZ
EDIAM		MARTINEZ BAEZ
FERNANDO		MARTINEZ ESPADA
ANGEL	L	MARTINEZ HERNANDEZ
LUIS	R	MARTINEZ ORTIZ
JUAN	G	MARTINEZ ROSADO
MANUEL	E	MARTIS ERAZO
CARLOS		MATOS TORRES
JOEL		MEDINA ACEVEDO
JOSE		MEDINA FIGUEROA
BEATRIZ DEL CARMEN		MEDINA MONTERO
LOUIS	E	MEDINA OLIVERA
CARLOS	M	MEDINA RIVERA
PAUL	M	MELLENDEZ LEBRON
ARISTIDES		MELLENDEZ OTERO
MADLINE		MELLENDEZ RIVERA

FUNDADOR		MENDEZ RUIZ
RAMON	A	MENDOZA SANCHEZ
JAIME	J	MERCADO RODRIGUEZ
FRANCISCO	J	MERCED VARELA
JOSE	M	MIELES CINTRON
RAFAEL	A	MOJICA ESPIRITU SANTO
JORGE	A	MOLINA ALAMO
LIZ	Y	MOLINA SANCHEZ
WILLIAM	J	MONTANEZ MONTES
ELIONEL		MONTERO RODRIGUEZ
MIGUEL	A	MORALES CRUZ
CELIA	E	MORALES MONTES
JORGE	L	MORALES MORALES
OCTAVIO	I	MORALES ROBLES
GERADO		MOTTA LOZADA
WILFREDO		MURIEL ZENON
RAMON	A	NEGRON MARTINEZ
JOSE	M	NEGRONI HERNANDEZ
REYNALDO		NIEVES JIMENEZ
MARISOL		NIEVES NIEVES
DIANA		NOGUERAS CRUZ
CARMEN	D	NUNEZ VAZQUEZ
RAMON	O	OLIVERAS RIVERA
MIZAEEL		OLMEDA FIGUEROA
VICTOR	M	ORTEGA OROZCO
BRENDA	E	ORTIZ BERBERENA
CARMEN	D	ORTIZ CRUZ
JOSE	M	ORTIZ LECODET
ENID	M	ORTIZ MALDONDO
WILMA	I	ORTIZ MARQUEZ
LUIS	A	ORTIZ ROSADO
RAWY		OTERO ORTIZ
BEATRIZ		OYOLA GARCIA
LISANDRA		PACHECO GONZALEZ
JOSE	L	PACHECO RODRIGUEZ
JUAN	J	PADILLA GARCIA
BRENDA LIZ		PAGAN
MIGUEL	A	PANTOJAS CONCEPCION
LUIS	A	PEREIRA CRUZ
JAYSON		PEREZ BURGOS
RENE		PEREZ COLON

ROBERTO		PEREZ CORREA
CARLOS	M	PEREZ MIRANDA
ANGEL	A	PEREZ MORENO
MARITZA		PEREZ RAMOS
SIGFREDO		PEREZ TORRES
JOSE	L	PIZARRO VELAZQUEZ
EDGAR	G	PRADO CAICEDO
ISRAEL		QUILES CARRASQUILLO
JOSE	H	QUINONES TROSSI
LUIS	A	RAMIREZ DE JESUS
VALENTIN		RAMIREZ FULGENCIO
LUIS	E	RAMOS APELLANIZ
CARLOS	A	RAMOS RAMOS
FELIX	A	RAMOS RENTAS
FRANCISCO		REYES PADILLA
REBECCA		REYES PEREZ
FELIX	R	REYES RODRIGUEZ
JOSE	G	REYES SANABRIA
JOSE	J	REYES SANABRIA
HOLVIN		REYES SANTOS
JONATHAN	L	RIFAS LLOYD
VICTOR	M	RIOS BAEZ
ROSALIA		RIVERA MEDINA
JONATHAN		RIVERA MELENDEZ
JUAN	A	RIVERA NEGRON
LUIS	A	RIVERA PERDOMO
WILLIAM	X	RIVERA REYES
NATANIEL		RIVERA RIVERA
SAMUEL		RIVERA RODRIGUEZ
ORLANDO		RIVERA VELEZ
CHRISTIAN		ROBLES CARDONA
MASAIL		ROBLES SANCHEZ
ANTONIO	C	RODRIGUEZ
LUIS	A	RODRIGUEZ COLON
SHALIMIR		RODRIGUEZ COLON
EDGAR	G	RODRIGUEZ DE JESUS
ROBERTO		RODRIGUEZ GARCIA
ZURIELL		RODRIGUEZ NIEVES
MIGUEL		RODRIGUEZ ORTIZ
JOSE	I	RODRIGUEZ RIOS
LUIS	A	RODRIGUEZ TORRES

DANIEL		RODRIGUEZ VALENTIN
JORGE	A	ROHENA VELAZQUEZ
GABRIEL		ROJAS MALAVE
YARITZA		ROLON BELTRAN
ROBERTO		ROMAN CAMPOS
JORGE		ROMAN RODRIGEZ
ANGEL	G	ROQUE GARAY
JUAN	D	ROSA CASTRO
JORGE	L	ROSARIO GARCIA
ROSA	M	RUIZ CRUZ
DANIEL		SAEZ MALDONADO
RENE	E	SAEZ MALDONADO
LUIS	A	SALAMO SUAREZ
JORGE		SALGADO ALVAREZ
SONIA	E	SALGADO MONTANEZ
ELISAMUEL		SANABRIA RIVERA
LUIS	J	SANCHEZ MORAN
DANIEL		SANCHEZ ROSARIO
EVELYN		SANTANA APONTE
DIANA		SANTANA LOPEZ
JAVIER		SANTIAGO
GERARDO		SANTIAGO GONZALEZ
HECTOR	I	SANTIAGO GONZALEZ
SANTOS	A	SANTIAGO HERNANDEZ
CHADIEL	C	SANTIAGO RODRIGUEZ
ANTONIO		SANTIAGO SANTIAGO
JAVIER	L	SANTIAGO TORRES
ASHLEY	M	SANTIAGO VALENTIN
JOSE	E	SANTOS OTERO
RONALD		SCHMINKY TORRES
JOSE	E	SERRANO COLON
LUIS	A	SIERRA RIVERA
ELMER		SOTO TORRES
HERIBERTO		TIRADO GARCIA
JORGE	A	TORRES AYALA
PERFECTO		TORRES NEGRON
DANIEL		TORRES RAMOS
PEDRO	J	TORRES RAMOS
CARMEN	L	TORRES RODRIGUEZ
ANTHONY	M	TORRES ROJAS
MARITZA		TORRES VALLE

OSVALDO		VALENTIN BLAY
GILBERTO	L	VASALLO MELENDEZ
RAFAEL		VAZQUEZ GARCIA
JOVANNY		VAZQUEZ MEDINA
GERMAN	J	VAZQUEZ VAZQUEZ
LUIS	D	VEGA CARLO
MIGUEL		VEGA RODRIGUEZ
TOMAS		VEGA VARELA
ORLANDO		VEGA VARGAS
MARIA		VELAZQUEZ CRUZ
DANIEL		VELEZ SEDA
JOHNNAYRI		VERGARA GARCIA
FERNANDO	A	VILLAMIL AULET
ANGEL	L	VILLEGAS JIMENEZ
FELIX	L	ZAMBRANA RIVERA
OSVIL	J	ZAMBRANA RIVERA
ANTONIO	T	ZAYAS FLORES
REYNALDO	L	CASANOVA SANTIAGO
ADRIANO	J	ECHEVARRIA ARELLANO
ANA	R	NICHOLS BONILLA
JACQUELINE		FONTANEZ RODRIGUEZ